

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIAH LOPEZ,

Plaintiff,

v.

CITY OF NEW YORK, NYC DEPT OF
HOMELESS SERVICES, NYC HUMAN
RESOURCES ADMINISTRATION, PROJECT
RENEWAL INC, QPS SECURITY INC, WIN INC,
CHRISTINE C. QUINN,

Defendants.

Civil Action No. 17-cv-3014
(VEC) (OTW)

**DECLARATION OF
JILL K. GRANT**

I, Jill K. Grant, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the bar of this Court and an attorney at the law firm of Willkie Farr & Gallagher LLP, attorneys for Women In Need, Inc. and Christine C. Quinn (together, the “WIN Defendants”). I submit this declaration in support of the WIN Defendants’ Motion to Dismiss the Second Amended Complaint, dated October 5, 2018.

2. Attached as **Exhibit A** is a copy of Plaintiff’s Second Amended Complaint.

3. Attached as **Exhibit B** is a copy of the May 9, 2017 Suspension Request Form concerning Plaintiff Mariah Lopez at Marsha’s House, previously filed with this Court as Exhibit 2 to the Declaration of Thomas B. Roberts, counsel to the City of New York, New York City Department of Homeless Services, and New York City Human Resources Administration (the “Municipal Defendants”), filed on June 15, 2018 in opposition to Plaintiff’s motion for a preliminary injunction at Docket Number 81 (the “Roberts Declaration”).

4. Attached as **Exhibit C** is a copy of the transcript of the May 31, 2017 proceeding before Judge Jaffe in the New York State Supreme Court, previously filed with this Court as

Exhibit 12 to the Declaration of Thomas B. Roberts, counsel to the Municipal Defendants, filed in support of the Municipal Defendants' motion to dismiss at Docket Number 46.

5. Attached as **Exhibit D** is a copy of the transcript of the May 31, 2018 hearing in this action.

6. Attached as **Exhibit E** is a copy of a letter Plaintiff filed in this action on August 7, 2018 (Dkt. No. 96).

7. Attached as **Exhibit F** is a copy of a WIN "Staff/Resident Complaint Form," previously filed with this Court on June 15, 2017 as an attachment to Plaintiff's motion for temporary injunctive relief at Docket Number 31.

8. Attached as **Exhibit G** is a copy of an email communication between Plaintiff and Evan Schnittman, Senior Counsel in the New York City Law Department, dated June 7, 2017, previously filed with this Court as Exhibit 13 to the Roberts Declaration.

9. Attached as **Exhibit H** is a copy of the Reasonable Accommodation Request Determination, dated June 26, 2017, and previously filed with this Court as Exhibit 17 to the Roberts Declaration.

10. Attached as **Exhibit I** is a copy of Plaintiff's June 15, 2017 "Emergency request for TRO," previously filed with this Court at Docket Number 31, which this Court later ordered would be treated as an amended complaint (July 5, 2017 Order, Dkt. No. 39.)

11. Attached as **Exhibit J** is a copy of the Decision and Judgement issued by the New York State Supreme Court, dated June 14, 2017.

12. Attached as **Exhibit K** are copies of decisions exclusively reported on computerized databases which are cited in the Memorandum of Law in support of Christine Quinn and WIN's Motion to Dismiss Plaintiff's Second Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 5, 2018
New York, New York

/s/ Jill K. Grant